



Humboldt County Farm Bureau
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February 11, 2014

California Coastal Commission
c/o Sea-level Rise Work Group
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Re: Response to Draft Sea Level Rise Policy Guidance Document

Dear Commissioners and Sea-level Rise Work Group:

The Humboldt County Farm Bureau is an organization of 500 family farmer members which was established in 1913 by local individuals in partnership with University of California Cooperative Extension, to enhance the opportunities for agricultural production in Humboldt County. These early pioneers possessed a vision to protect agricultural lands and to take advantage of the unique climate and excellent growing conditions of the highly productive coastal lands well suited for agriculture around Humboldt Bay and the Eel River Valley.

When considering the potential impacts of sea-level rise on California's coastal communities Humboldt County is unique and warrants special consideration. The coastal areas of our region contain more than 20,000 acres of prime agricultural lands that are potentially impacted by sea-level rise. These coastal lands are largely home to the County's dairy industry and support many "Grass Fed Beef" producers that utilize the areas productive pasture lands for cow-calf and stocker operations.

These coastal agricultural lands owe their productivity to the mild marine climate, deep soils and high ground water, boasting as many as 320 growing days a year and supporting hundreds of local jobs. These lands contribute to a significant portion of the overall value of Humboldt County's agricultural economy. Along with the agricultural productivity there exists biological productivity, and a multitude of terrestrial, avian and aquatic species that are dependent on the freshwater habitats these coastal lands provide. This unique coastal resource is an important economic, environmental and cultural asset of historical significance to Humboldt County.

When the Farm Bureau reviewed the California Coastal Commission's Draft Sea-Level Rise Policy Guidance document, it was evident that the draft document did not specifically address protecting agricultural lands. The Coastal Act calls for the protection of agricultural lands (Chapter 3) along with other coastal resources. Public Resource Code Section 30241 states in part that "the maximum amount of prime agricultural land shall be maintained in agricultural production to assure the protection of the areas' agricultural economy". We understand this is an important mandate for the Coastal Commission and we appreciate your past dedication to protecting agricultural lands.

Coastal areas around Humboldt Bay are unique with respect to the rest of California, due to large acreages of prime agricultural land (Coastal Act Section 30113) that is protected from tidewaters by historic flood control structures such as dikes, flood gates and levees. During the late 19th and 20th centuries under the “Swamp and overflowed Lands Act”, thousands of acres of high tidal marsh were diked and made into productive agricultural land by excluding sea water. Several factors make Humboldt County’s coastal agricultural lands unique when considering sea-level rise and policies appropriate for protecting agricultural resources as proposed in the Coastal Commission’s Draft Policy Sea-level Guidance Document.

First, there are substantial acreages of productive agricultural lands protected by historical structures (dikes and levees). This land is ecologically important because of its ability to provide a unique year-round short grass habitat. Second, the Local Coastal Plan (LCP) clearly provides for the protection of agricultural lands and the continuation of agricultural production. The policy guidance should integrate the objectives of Humboldt County’s LCP’s. Third, the Draft Policy Guidance explains that while coastal areas north of Cape Mendocino are generally experiencing uplift, the Eel River estuary and Humboldt Bay are experiencing subsidence (pg.4 fn.2) meaning even greater potential sea water inundation impacts when added to sea-level rise.

The Farm Bureau requests consistency with Coastal Act mandates and explicit policies necessary to accomplish protection of the unique agricultural resources in the coastal regions of Humboldt Bay. The Coastal Commission’s future Sea-Level Rise Policy Guidance should acknowledge the unique problems faced by Humboldt County in protecting its coastal agricultural lands and recognize the role that existing dykes and levees play in their future protection. The Coastal Commission’s Sea-Level Rise Policy Guidance should provide policies that establish affordable avenues for landowners to repair, maintain and improve those structures as required to preserve the current land base. Providing a streamlined process for a regional programmatic exemption or permitting program is imperative so ranchers can raise dike and levee elevations to heights necessary for protecting lands from increasing tidal action. One highly important feature of this program should be an allowance for the proportional widening of the bases of these dikes to maintain structural functionality as the rise in sea level elevation requires.

We encourage you to revise the Draft Sea Level Rise Policy Guidance Document to include the mandated “Protection” of agricultural lands in our coastal region and work to approve and provide policies that allow for the maintenance and improvement of essential dikes and levees in order to respond to the threat of sea-level rise.

Thank you for your consideration.
Sincerely,



Greg Dale
Humboldt County Farm Bureau
President